

COMPLAINT FORM

(for filers who are prisoners without lawyers)

FILED

FEB 26 2020

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

IN THE UNITED STATES DISTRICT COURT
FOR THE Southern DISTRICT OF Indiana

(Full name of plaintiff(s))

Jeremy Ray Jackson 12372-028

Muhammad Ahmad Ajaj 40637-053

VS

Case Number:

(Full name of defendant(s))

12 : 20 -CV- 0116 JPH -DLP

(to be supplied by clerk of court)

Federal Bureau of Prisons, United States Penitentiary Terre Haute Administration Staff including T.J. Watson (Complex Warden), Michael Underwood (A.W. of Custody), J.W. Cox (A.W. of Operations), Rob Schalburg (Head of the Legal Dept.), Ishmael Oliver (Food Service Administrator), and Amanda Adams (Head of the Recreation Dept.).

A. PARTIES

1. Plaintiff is a citizen of Indiana, and is located at
(State)

U.S. Penitentiary Terre Haute, P.o. Box 33, Terre Haute IN 47808
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant (See page labeled at the top as "Complaint Page 1 Cont.")
(Name)

2. Defendant : Federal bureau of prisons, United States Penitentiary Terre Haute Administration Staff including T.J. Watson (Complex Warden), Michael Underwood (A.W. of Custody), J.W. Cox (A.W. of Operations), Rob Schalburg (Head of the Legal Dept.), Ishmael Oliver (Food Service Administrator), and Amanda Adams (Head of the Recreation Dept.).

is (if a person or private corporation) a citizen of Indiana
(State, if known)
and (if a person) resides at United States Penitentiary Terre Haute
(Address, if known)
and (if the defendant harmed you while doing the defendant's job)
worked for _____
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Mr. Ishmael Oliver violated my rights protected under the Religious Freedom Restoration Act (R.F.R.A.) which says that a government may not "substantially burden" a person's exercise of religion unless it "demonstrates" that doing so "(1) is in furtherance of a compelling governmental interest; and (2) is the least restrictive means of furthering that governmental interest." 42 U.S.C. §2000bb-1. He did this by trying to starve me/burden me off of the religious dietary menu known as the "halal menu" from 8-1-18 till current date. The food service department also serves things that do not carry the halal stamp, allow non-muslims to prepare and handle the meals and raw food, and serve regular meals without calorie increases on days that the non-religious "holiday meals" have heavy increases to calories for their meals. All these are tactics to discourage people off of the religious dietary menu. They also have served under the minimum calories required by law for extended amounts of time to try to starve people off of the menu which I can prove. T.J. Watson Michael Underwood, J.W. Cox, and Rob Schalburg violated the R.F.R.A. by allowing these conditions to go on for extended amounts of time, even after receiving numerous e-mails on several issues regarding the halal menu including the minimum calories per day not being met by the letter of the law. I have documentation and copies of these e-mails that they repeatedly disregarded

over and over and will present them as evidence in this case. Mrs. Adams violated my 1st amendment rights in several ways during the sacred and holy month on 5-24-18 including but not limited to confiscating refreshments that were given to everyone else, calling me degrading religious slurs and names, and then having me locked up for nothing more than wanting to adhere to my religion by not listening to music which is a sin in Islam and diminishes the fast, like all sins do, of Ramadan. Me having the ability to fast during Ramadan without the fear of repercussions is protected under the 1st amendment. This happened on the "east yard" of Terre Haute U.S.P. and I was locked into my cell as a result of this on the C-1 unit until their event was over. Witnesses to this include several inmates and staff which I will present a list of when I am heard in court and they will also be seen on video of the "east yard" and the C-1 unit that I asked to be preserved in order to prove my case when I filed the administrative remedy. Finally, the Federal Bureau of Prisons Violated my rights by not persuing and correcting these issues when they were made aware of them and not repremending or punishing the staff responsible to prevent it from going on or happening again. They failed to do anything during the administration remedy process and afterwards in the form of the TORT claim which I also have copies of. I ask this court to grant me a hearing so that I can present evidence to further prove my case to make an attempt to rectify these issues and prevent them from ever happening again.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.
OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

For relief I am asking for \$100,000 for physical injuries including but not
limited to diminished mental capacity, headaches, fatigue, weight loss, and
an issue that is documented related to my feet which the medical department
refuses to follow up on. I have also spent monies to suplemnt my diet, money
on mail services sending and recieving administrative remedies, printing out
e-mails and other documents, and spends numerous of hours with all of the back
and forth talking to staff and also the money I have spent on materials to
type things and copy things which all takes money as well. I also want an
apology from the B.O.P. and a promise to inmprove and rectify all the issues
I have named and train staff to accomidate religious practices for all religi-
ous groups here at the Terre Haute facility. I also ask that a muslim of our
group be appointed to handle and prepare the halal food that is served here.

E. JURY DEMAND

☒ Jury Demand - I want a jury to hear my case
OR

☐ Court Trial - I want a judge to hear my case

Dated this 17th day of February 20 20.

Respectfully Submitted,

Jeremy Ray Jackson
Signature of Plaintiff

12372-028
Plaintiff's Prisoner ID Number

P.O. Box 33
Terre Haute, IN 47808
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.

NAME: JEREMY RAY JACKSON

NUMBER: 12372-028

United States Penitentiary

P.O. Box 33

Terre Haute, IN 47808

INDIANAPOLIS

19 FEB 2020



RECEIVED

FEB 24 2020

U.S. CLERK'S OFFICE

⇔ 12372-028 ⇔

United States Courthouse

921 Ohio Street

* Room 104 *

Terre Haute, IN 47801

United States

UNITED STATES MARSHAL
SERVING BY
MAGNETOMETER



47807-373829

